

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ALTPASS LLC,)	
)	
Plaintiff,)	Case No. 2:20-cv-00125-JRG
)	
v.)	PATENT CASE
)	
KYOCERA INTERNATIONAL, INC.,)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	

**DECLARATION OF ERIC KLEIN IN SUPPORT OF KYOCERA INTERNATIONAL,
INC.'S MOTION TO DISMISS COMPLAINT FOR IMPROPER VENUE OR, IN THE
ALTERNATIVE, TRANSFER TO SOUTHERN DISTRICT OF CALIFORNIA**

In accordance with 28 U.S.C. § 1746, I, Eric Klein, declare as follows:

1. I am a Vice President, General Counsel, and the Corporate Secretary of Kyocera International, Inc. I make this declaration in support of Kyocera International, Inc.'s Motion to Dismiss for Improper Venue, or, in the Alternative, Transfer to Southern District of California in the above-captioned action. I have personal knowledge of the facts set forth herein.

2. Kyocera International, Inc. ("Kyocera") is a California Corporation with its principal place of business in San Diego, California.

3. Kyocera does not have any place of business or offices in the Eastern District of Texas. Kyocera does not own, lease, or operate any business (including any office, warehouse, store, or other facility) in the Eastern District of Texas. Kyocera does not own, lease, or manage any property in the Eastern District of Texas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on June 11, 2020 in San Diego, California


Eric Klein

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this, the 6th day of July, 2020. Any other counsel of record will be served by first class U.S. Mail on this same date.

/s/ Justin E. Gray
Justin E. Gray